

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE**

---

**MARY PHILLIPA SLEDGE, MARY JANE  
PIDGEON SLEDGE TRUST, and PIDGEON SLEDGE FAMILY  
LIMITED PARTNERSHIP,**

**Plaintiffs,**

**vs.**

**Civ. 2:13-cv-2578**

**INDICO SYSTEM RESOURCES, INC. and,  
CLEAL WATTS, III**

**Defendants.**

---

**CERTIFICATE OF CONSULTATION**

---

COMES NOW Loys A. “Trey” Jordan, III and Joseph B. Baker, counsel for Movants Michael Byrd and Byrd’s Eye Enterprise, Inc., and hereby submit this Certificate of Consultation pursuant to Local Rule 7.2(a)(1)(B), and would state unto the Court the following:

Loys A. “Trey” Jordan, III spoke telephonically with Darrell N. Phillips, counsel for Plaintiffs, on July 2, 2015 regarding the contents of Movants’ *Motion to Quash Subpoenas Issued and Served Upon JP Chase Morgan, Sea West Coast Guard Federal Credit Union, and Wells Fargo Bank, N.A., and in the alternative, For Protective Order*, and counsel for Plaintiffs advised that Plaintiffs oppose the motion to the extent that the subpoenas issued to JP Morgan Chase, Sea West Coast Guard Federal Credit Union, and Wells Fargo Bank, N.A. would be quashed but that, based on initial consultation, the parties may be in a position to agree on a proposed consent order to be submitted to the Court for consideration that would provide protective relief to Movants and which would resolve the issues in the Motion filed by Movants’ counsel.

Respectfully submitted,

McDONALD KUHN, PLLC

/s/Joseph B. Baker

Loys A. "Trey" Jordan, III (16766)

Joseph B. Baker (28046)

5400 Poplar Avenue, Suite 330

Memphis, Tennessee 38119

(901) 526-0606

*Attorneys for Movants*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading has been served on the following, via US Mail First Class, postage pre-paid, and via electronic mail, on this the 2<sup>nd</sup> day of July, 2015:

Darrell N. Phillips, Esq. (dphillips@pcplc.com)  
Anthony C. Piertrangelo (apietrangelo@pcplc.com)  
John J. Cook (jcook@pcplc.com)  
Pietrangelo Cook PLC  
6410 Poplar Avenue, Suite 190  
Memphis, Tennessee 38119

Randall J. Fishman, Esq. (ecfcivil@bbfpc.com)  
Richard S. Townley, Esq. (ecfcivil@bbfpc.com)  
200 Jefferson Avenue, Suite 1250  
Memphis, Tennessee

/s/Joseph B. Baker

Loys A. "Trey" Jordan, III

Joseph B. Baker